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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RAMON MORGA,

Petitioner,

vs.

CHARLES DANIELS, *et al.*,

Respondents.

Case No.: 2:21-cv-01743-APG-BNW

**MOTION FOR ENLARGEMENT OF TIME**  
**(FIRST REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a 63 day enlargement of time, to February 28, 2022, to answer Ramon Morga's ("Morga") first amended habeas petition (ECF No. 4).

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

Respondents have not requested any prior enlargements of time to respond to Morga's first amended petition. The current response due date is January 3, 2022. This motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 28th day of December, 2021.

AARON D. FORD  
Attorney General

By: /s/ Geordan Goebel  
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**DECLARATION OF COUNSEL**

I, Geordan Goebel, hereby state, based on personal knowledge, that the assertions of this declaration are true:

1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of Nevada in the Post-Conviction Division (PCD), and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. By this motion, I am requesting a sixty three (63) day enlargement of time, to and including February 28, 2022, in which to file and serve a response to Ramon Morga's first amended habeas petition. This is my first request for an enlargement of time to respond to Morga's petition. This extension of time is necessary for me to properly prepare a response to the first amended petition.

3. This enlargement of time request was prompted by the currently approaching response due date of January 3, 2022. I have another federal habeas case pending (Antonio Mixon, Case 2:17-cv-02292-RFB-NJK), which also has a response date of January 3, 2022. Our office has yet not received all the state court records and exhibits for this case. The additional time is necessary to complete the record and properly prepare a response to the first amended petition.

  
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ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE